



JACOBS ENGINEERING GROUP INC.
WESTERN REGION ENVIRONMENTAL DIVISION

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April 30, 1990

Sally Martyn
U.S. EPA Region X
1200 Sixth Avenue
Seattle, WA 98101

**Re: Review of Cover Letter Submitted by Gulf Resources and Chemical Corporation
with the Asbestos Removal and PCB Management and Disposal Plans Required
by the 1989 Unilateral Order
Work Assignment No. 566**

Dear Ms. Martyn:

This letter contains our comments regarding the cover letter dated March 23, 1990 which was submitted by Gulf Resources and Chemical Corporation with the Asbestos Removal and PCB Management and Disposal Plans required by the 1989 Unilateral Order. As you requested, we have reviewed the letter for accuracy with respect to the non-populated RI/FS.

Beginning on page 4 of the above-referenced letter, Gulf has responded to Paragraphs 49 and 50 of the Order which relate to plans for removal and disposal of friable asbestos materials. Gulf states that *"Asbestos conditions in the smelter complex, including, among other areas, the Lead Smelter and Zinc Plant areas, currently are being evaluated by Gulf . . . in the comprehensive non-residential areas RI/FS."* Footnote 4 refers the reader to "Task 8" of the RI/FS. We would like to point out that there has been no comprehensive evaluation and/or inventory of asbestos conditions in the Smelter Complex under the nonresidential areas RI/FS. The limited number of asbestos samples taken in the Smelter Complex under Task 8 were *"spot"* samples to screen for the presence of asbestos. Of the 27 samples taken to target materials which may contain asbestos, 14 contained greater than 20% asbestos. The limited number of samples taken can be used to verify that asbestos-containing materials are present within the Smelter Complex. However, no inventory of asbestos materials within the complex has been performed by Gulf under the RI/FS and the extent of the asbestos contamination within the Smelter Complex has not been characterized or quantified. Such an inventory and comprehensive evaluation is necessary to planning for removal and disposal of the friable asbestos.

Therefore, Gulf's statement on page 5 of the above-referenced letter that *"Initiation of further asbestos removal activities prior to development and thorough evaluation of pertinent information in the RI/FS process may lead to unnecessary, inappropriate, and wasteful remedial actions"* is misleading, since no such evaluation has been accomplished by Gulf during the RI/FS process. The overall Task 8 Data Evaluation Report, submitted by Gulf's subcontractors on March 26, 1990 summarizes asbestos conditions by citing the ATSDR public health advisory and the 1989 Unilateral Order.

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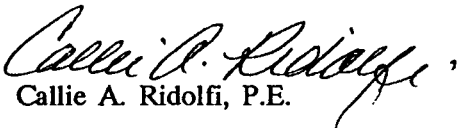
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With regard to PCB concerns, on page 8 of the above-referenced letter Gulf states that *"Moreover, like asbestos conditions, long-range concerns as to PCBs currently are being evaluated in the ongoing RI/FS process, in which a comprehensive evaluation of PCB-related data and appropriate remedial measures will be conducted."*¹⁶ Again, therefore, *absent conditions indicating an imminent and substantial endangerment, requiring immediate PCB response actions prior to completion of the RI/FS is unnecessary and wasteful, and constitutes arbitrary and capricious action by EPA.*" Footnote 16 refers the reader to "Task 8" of the RI/FS. Again, we note that a comprehensive evaluation of PCB conditions and remedial measures has not been accomplished through the RI/FS process. Sites sampled under "Task 8" of the RI/FS which were analyzed for PCBs included surface materials near electrical substations or electrical storage areas, and stream sediment samples, primarily to determine if soil or loose materials underlying transformers contain PCBs. No evaluation or inventory of PCB-containing equipment has been performed under the RI/FS. To quote from the overall "Task 8" Data Evaluation Report submitted by Gulf's contractor on March 26, 1990 (page 4-153): *"The Task 8 investigations at electrical substations/electrical equipment storage areas focused on areas of potential leakage or spillage. In accordance with the Work Plan and FOP, an inventory of PCB-containing equipment was not performed as part of the RI. Maintenance and recordkeeping requirements for PCB equipment are enforced under separate EPA authority."*

In summary, Gulf's argument that actions taken now to plan for and remove asbestos and PCB contamination from the Smelter Complex would be wasteful because of the evaluations currently being done under the RI/FS process are unsubstantiated.

If you have any questions concerning our review, please contact me.

Sincerely,


Callie A. Ridolfi, P.E.

CAR:tb

cc: Beth Feeley, EPA
Lloyd Reed, JEG

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